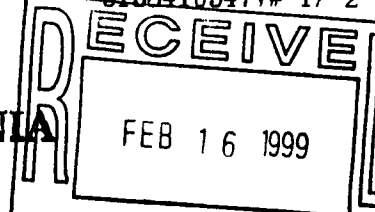


# FAMILY WINEMAKERS OF CALIFORNIA

An Association of California Table Wine Producers



Fax 916-541-0295

February 12, 1999

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 Paul Krounberg

**Dr. Larry Hart**  
**Board Executive Secretary**  
**National Toxicology Program**  
 111 T.W. Alexander Drive  
 Building 101, North Campus  
 Research Triangle Park, NC 27709

Re: NTP Recommendation on Carcinogenicity of Alcohol

Dear Dr. Hart:

The National Toxicology Program's fast-track process for considering listing alcohol as a carcinogen needs to be halted until several critical scientific and procedural matters are addressed. Unless the science can withstand the rigors of peer review and public scrutiny, and the listing process is deemed fair, confidence in NTP's hazard identification will suffer and irreparable harm may be caused to a significant economic sector of the U.S. economy, particularly the wine industry. Family Winemakers of California (FWC) strongly urges NTP to delay any consideration of a recommendation to the Secretary of Health and Human Services.

FWC represents over 270 small and medium-sized, family-owned wineries in the state. Our members produce and market premium table wine. Their livelihood depends on public perception and confidence regarding the quality and safety of the wine in the bottle. A listing, if inappropriately done or based on old studies, will undermine the wine industry as consumer uncertainty is created. California's wine industry alone is valued at \$10 billion, produces \$250 million in taxes and employs over 100,000 people.

Specifically, we are concerned about the precedent NTP will set with its first-ever listing of a foodstuff, the inconclusiveness of the current science, and procedural issues at the sub-committee level.

The National Toxicology Program periodic reports on carcinogens is aimed at hazard identification. NTP's consideration of alcohol beverages represents the first time that a foodstuff has been reviewed. NTP listings are irrespective of dose and create the impression that even de minimus amounts are harmful (or so anti-alcohol forces will have the public believe). A listing is done without regard for the positive effects of a substance. And, in the case of alcohol, but particularly wine, a growing body of studies about the healthful aspects of moderate consumption will be ignored. At a minimum, an independent examination and analysis of the entire body of scientific literature pertaining to alcohol consumption must be undertaken. This has not been done and until it is, the integrity of NTP's process and its susceptibility to political agendas remains in question.

Alcohol consumption trend analysis reveals that the vast majority is done responsibly. The history of beverage use in society spans thousands of years.

OPTIONAL FORM 99 (7-90)

## FAX TRANSMITTAL

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To <u>Bill Johnson</u>	From <u>Angie Wilson</u>
Dept./Agency	Phone #
Fax # <u>(1-0947)</u>	Fax #
NSN 7540-01-317-7388	5010-101 GENERAL SERVICES ADMINISTRATION

**NTP Recommendation**  
**February 12, 1999**  
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NTP would do a major disservice by confusing the public in listing alcohol as a human carcinogen based on inconclusive evidence. One need only look at the sad history of public hysteria, and the resultant economic damage, created by exposure scares (Alar). If the past two decades have taught us anything it is that science is dynamic and what we knew 10 years ago may not be what we know today. NTP should be duty bound to seek the current and best science on alcohol, not rely solely on a dated listing by the World Health Organization and the International Association for Research & Cancer.

The record of the National Toxicology Program subcommittee handling this issue is marked by confusion among members responsible for the procedures and process. The gravity associated with any listing should be matched by a clear and clean administrative process. While it is exceeding difficult to insulate a scientific review and consideration from public and political pressures, it is incumbent on NTP, in order to preserve the credibility of its listings, to conduct a fair and open-minded process.

For these reasons Family Winemakers of California strongly encourages NTP to delay any recommendation on alcohol. Thank you for considering our views on this critical matter.

Sincerely,

  
Paul Kronenberg  
Executive Director